



MSAPC ADVISORY CIRCULAR

U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF AIR AND WASTE MANAGEMENT ●

MOBILE SOURCE AIR POLLUTION CONTROL

A/C NO. 19B

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SUBJECT: "Zero Miles"

A. Purpose

The purpose of this Advisory Circular is to clarify the Motor Vehicle Emission Control Regulations regarding the definition of "Zero Miles" and to qualify the requirements for reuse of vehicle components. This circular supersedes Advisory Circulars No. 19A and No. 19A-1 which are obsolete and should be discarded.

B. Background

1. The Motor Vehicle Emission Control Regulations published on November 10, 1970 (35 F.R. 17228) and applicable to the 1972 model year contained the following definition of "zero miles": "that point after initial engine starting (not to exceed 10 miles of vehicle operation) at which adjustments are completed."

2. Advisory Circular No. 19A, dated November 5, 1972, was issued to clarify the regulatory language used to define "zero miles." Advisory Circular No. 19A-1, dated August 10, 1973, addressed the "zero-mile" definition as it related to the reuse of components on certification vehicles.

3. A revision to the regulations made on June 28, 1973, changed the "zero-mile" definition to "that point after initial engine starting (not to exceed 10 miles of vehicle operation, or one hour of engine operation) at which normal assembly line operations and adjustments are completed."

4. Manufacturers have requested a more liberal interpretation of the "zero-mile" definition with respect to reuse of components on certification vehicles. The list in Advisory Circular No. 19A-1 was considered by manufacturers to be unduly restrictive as to the reuse of some components because their impact on emissions was considered to be indirect and not subject to significant mileage accumulation effects, at least at low mileage. EPA has reviewed this matter, and concurs that some easing of these restrictions is appropriate.

5. In order to amplify the new "zero-mile" definition and to state the modified EPA position on reuse of vehicle components, this Advisory Circular No. 19B has been prepared.

C. Applicability

This Advisory Circular is effective immediately and will apply to all gasoline fueled and Diesel light duty vehicles and light duty trucks.

D. Interpretation of "Zero-Miles" Definition

1. 40 CFR 85.075-7(e) [and 86.077-26(a)(7)] provides that the manufacturer must submit to EPA "zero-mile" test data on any certification vehicle which he proposes to operate and test, prior to beginning mileage accumulation on that vehicle. The definition of "zero miles" in 40 CFR 85.002(a)(21) [and 86.077-2] refers to the initial starting of the engine in the test vehicle and makes mileage accumulation and time of engine operation the parameters for defining the "zero-mile" limitation. The above-cited sections of the regulations are intended to assure that test vehicle-engine assembly is representative of production vehicle assembly and that all service accumulation is conducted in accordance with the certification regulations.

2. Accordingly, no operation of the engine is permitted unless the engine is installed in the test vehicle, and no mileage accumulation or engine operation is permitted (other than the 10 miles or one hour allowed under 40 CFR 85.002(a)(21), or 86.077-2, plus the preconditioning mileage associated with the initial emission test) unless the "zero-mile" test data have been submitted to EPA. Failure to comply with the above-cited sections of the regulations may result in disqualification of the test vehicle. [However, when a manufacturer demonstrates to EPA's satisfaction that additional operation and/or testing of the engine and/or vehicle is a standard practice in the production of the manufacturer's light duty vehicles and light duty trucks, EPA will, on a prior-approval basis, allow the manufacturer to duplicate that practice for test vehicles and/or engines.]

E. "Zero-Mile" Vehicles and Components

1. Used components which may reasonably be expected to have no effect on emissions, such as external sheet metal and interiors, may be used in certification vehicles.

2. Those items which have a potential direct influence on emissions must be new for use in certification vehicles. Items in this category would include:

- a) engine,
- b) exhaust emission control system including carburetor, fuel injection system and auxiliary emission control devices,
- c) ignition system,
- d) for emission data vehicles selected under §86.077-24(b), evaporative emission traps and any active evaporative emission control system components.



3. Those items which have a potential indirect influence on emissions which were previously used on certification vehicles may be reused on a new certification vehicle. For used components having more than 5,500 miles on them at the time they are to be installed on a new certification vehicle, the manufacturer must show that the parts still meet design specifications. Parts with fewer than 5,500 miles on them may be reused without showing conformance with design specifications. Items in this category would include:

- a) transmission,
- b) clutch assembly (if applicable),
- c) differential assembly,
- d) fuel system (excluding any components which are part of an emission control system)
- e) brakes,
- f) tires,
- g) cooling system,
- h) non-active evaporative emission control system components. (all evaporative emission control system components for durability-data vehicles selected under §86.077-24(c)).

Those components in this category which are not new shall be listed, with the total mileage or service accumulated on each such item, in the Zero Mile Data Book supplied to EPA at the zero-mile point.

4. It is the manufacturer's responsibility to seek clarification from EPA as to the suitability of used components, other than those specified above, whose effect on emissions may not be clear, and to provide whatever data EPA needs to make the necessary determinations.

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